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— LAW FIRM —

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Attorneys for Defendants Southwest  
Human Development and Gwyneth Kelly

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF ARIZONA**

Jessica Kahraman, an individual; D.K., a minor,  
through his parent and guardian Jessica Kahraman;  
and K.K., a minor, through his parent and guardian  
Jessica Kahraman,

Plaintiffs,

vs.

The State of Arizona, a governmental entity; Arizona  
Department of Child Safety (“DCS”), a governmental  
entity; Sarah Kramer, individually and as an employee  
with DCS, and John Doe Kramer, her spouse; Sarah  
Mendez, individually and as an employee with DCS,  
and John Doe Mendez, her spouse; Madison Bell,  
individually and as an employee with DCS, and John  
Doe Bell, her spouse; Mecca Temple, individually and  
as an employee with DCS, and John Doe Temple, her  
spouse; Gregory McKay, individually and as an  
employee with the State of Arizona as the former  
Director of DCS, and Jane Doe McKay, his spouse;  
Michael Faust, individually and as an employee with  
the State of Arizona as the current Director of DCS,  
and Jane Doe Faust, his spouse; Banner Children’s at  
Desert, formerly Cardon Children Medical Center  
(“Banner”), an Arizona nonprofit organization; Ryan  
M. Stewart, M.D., individually and as an employee  
with Banner, and Jane Doe Stewart, his spouse; Maria  
Chico, individually and as an employee with Banner,  
and John Doe Chico, her spouse; Southwest Human  
Development (“SWHD”), an Arizona nonprofit  
organization, individually and as a service provider  
for the State of Arizona; Drue Kaplan-Siekman,  
individually and as an employee with SWHD, and  
John Doe Siekman, her spouse; Gwyneth Kelly,

Case No. 2:22-cv-00375-SRB

**DEFENDANT GWYNETH  
KELLY’S MOTION FOR  
LEAVE: (1) TO EXCEED  
LRCiv 7.2(e)(2) PAGE LIMIT  
ON DEFENDANT  
GWYNETH KELLY’S  
REPLY IN SUPPORT OF  
MOTION FOR JUDGMENT  
ON THE PLEADINGS; AND  
(2) FOR AN EXTENSION TO  
FILE REPLY  
(First Request)**

1 individually and as an employee with SWHD, and  
 2 John Kelly, her spouse; Michael Kelly, M.D. an  
 3 individual, and Jane Doe Kelly, his spouse; John and  
 4 Jane Does 1-5; and Black Entities 1-5,  
 5  
 6 Defendants.

7 Pursuant to LRCiv 7.2(e)(2) Defendant Gwyneth Kelly (“Defendant”) hereby  
 8 moves the Court for leave to exceed the eleven (11) page presumptive limit for Defendant’s  
 9 Reply in Support of Motion for Judgment on the Pleadings to Plaintiffs’ 21-page Combined  
 10 Response in Opposition to Defendants’ Motions for Judgment on the Pleadings (Doc. 168).  
 11 Due to the number, length, and nature of the arguments raised in Plaintiffs’ Combined  
 12 Response, Defendant’s Reply will exceed the presumptive limit. Defendant expects her  
 13 reply will exceed the limit by three (3) pages (and only two (2) pages if the first page  
 14 consisting of the case caption is not counted). Defendant believes that the three (3) extra  
 15 pages are necessary to adequately respond in opposition to Plaintiffs’ Combined Response,  
 16 and Support Defendant’s Motion for Judgment on the Pleadings (Doc. 153). Consequently,  
 17 Defendant requests the Court allow Defendant to file a 14-page Reply in Support of her  
 18 Motion for Judgment on the Pleadings.

19 Pursuant to Fed. R. Civ. P. 6(b)(1)(A) and LRCiv 7.3, Defendant further requests a  
 20 brief extension until September 29, 2023 to file her Reply in Support of Motion for  
 21 Judgment on the Pleadings which is currently due on September 25, 2023 based on the  
 22 number, length, and nature of the arguments raised in Plaintiffs’ Combined Response and  
 23 efforts to limit the page length of her Reply to 14 pages as addressed above. This is  
 24 Defendant’s first request for an extension of time to file her Reply in Support of Motion  
 25 for Judgment on the Pleadings, as such no prior extension has been sought or granted.  
 26 Defendant makes this request in good faith and not for purposes of delay.

27 Defendant has contacted the other parties by email for their position on this motion  
 28 and they have no objection.

For the Court’s convenience, a proposed form of Order granting Gwyneth Kelly’s  
 Motion for Leave: (1) to Exceed LRCiv 7.2(e)(2) Page Limit on Defendant Gwyneth

1 Kelly's Reply in Support of Motion for Judgment on the Pleadings; and (2) for an  
2 Extension to file the Reply is lodged herewith.

3 RESPECTFULLY SUBMITTED this 22<sup>nd</sup> day of September 2023.

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5 **GRASSO LAW FIRM, P.C.**

6 By /s/Pamela L. Judd  
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